

FAX from **KEN**

Date

9-21-98

Number of pages including cover sheet

2

Subject: PL HCP Comments from California State Parks
Permit # PRT- 828450 + 1157

TO: Bruce Halstead

FROM:

Ken Anderson

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REMARKS: ☐ Urgent ☐ For your review ☐ Reply ASAP ☐ Please Comment

STATE OF CALIFORNIA—RESOURCES AGENCY

PETE WILSON, Governor

DEPARTMENT OF PARKS AND RECREATION**NORTH COAST REDWOODS DISTRICT**

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September 21, 1998

Mr. Bruce Halstead

USFWS

1125 16th Street, Room 209

Arcata, CA 95521

Dear Bruce,

Please find attached California State Park comments regarding the PL HCP, PRT 828950 and 1157. The document represents a lot of hard work on the behalf of many specialists. We commend their efforts. If you have any questions please call me at the above number.

A handwritten signature in dark ink, appearing to read 'Ken Anderson'.

Ken Anderson

Resource Ecologist

Sept 21, 1998

California Department of Parks and Recreation

Comments of Ken Anderson, Resource Ecologist and Patrick Vaughan, Engineering Geologist,
Eureka, CA

Habitat Conservation Plan - PRT- 828950 & 1157

Pacific Lumber Company et al

1. In general the plan is more a plan of "take", rather than conservation. It proposes to decrease habitat for many late seral species in the short term and grow it later on even though the entire document is only good for 50 years. Rather than proposing ways to conserve and increase habitat for late seral related species the plan is geared to reducing current old growth habitat as much as possible. A better title for the document would be "A Plan to Decrease Endangered Species and Wildlife Habitat". | CDPR-1
2. We oppose the concept of PL receiving assurances no future species will be listed on their properties. This is contrary to basic species management. What if a species is found on PL property and is located nowhere else on earth. This plan would allow PL to manage the species into extinction. At a minimum PL would not have to even consider the species in their management. | CDPR-2
3. The plan should provide more buffers and conservation measures in the Special Treatment Areas around state parks. The only place STA protections are mentioned are in the murrelet areas. Many of these have already been cut along the north boundary of Humboldt Redwoods State Park. | CDPR-3
4. We disagree with the concept of "take". How can management actions which kill endangered species or destroy their habitat be called conservation? All actions in a HCP should be geared towards recovery, not maintaining some minimum amount of habitat. | CDPR-4
5. PL has conducted many studies on Humboldt Redwoods State Park (HRSP) and Grizzly Creek State Park as a result of the HCP. We request copies of all data, analysis and summaries regarding these studies. | CDPR-5
6. The language used for the MMCAs in terms of harvest prescriptions is discretionary (may instead of shall). Therefore, as currently written, there is no assurance that they will not be cut or managed for old growth characteristics. | CDPR-6
7. Which agencies will be involved in developing modified watershed analysis? What types of questions are being addressed specific to California? | CDPR-7
8. Will all mass wasting risk areas be avoided and if not, what is the criteria to define acceptable risk? | CDPR-8
9. Is seismicity and geologic structure/earth material nature to be a REQUIRED component of the risk analysis (plus storage potential for sediment at risk in the event of its' failure)? | CDPR-9

10. The WLPZ widths and proposed activities are extremely inadequate and will lead to further destruction of riparian and instream habitat. All WLPZ areas should be no cut areas. We recommend 300 feet for Class 1, 200 feet for Class 2, 100 feet for Class 3 and 50 feet for Class 4 water courses.

CDPR-
10

The currently proposed prescriptions for the stream buffers in the HCP, particularly for the Class 1 streams are so complicated (7 pages of prescriptions) that it will be impossible to apply them on the ground, check for compliance, and will provide ample opportunity for circumvention. The prescriptions we propose above are direct, simple, and would be acceptable we believe, to all biologists.

CDPR-
11

11. Agencies should comment on ALL new roads. CDMG should be involved in new road construction. California State Parks (CSP) should be involved if THP boundaries are within affected watersheds. NMFS should have geologists which review all road issues.

CDPR-
12

12. Who will determine if modifications are necessary to mileage limitations?

CDPR-
13

13. Who will inspect roads and what will their qualifications be?

CDPR-
14

14. Imminent failures should be treated upon discovery where practical.

CDPR-
14

15. Certified Engineering Geologist should replace geologist and registered geologist where listed in the document.

CDPR-
15

16. Is the wood removed from the road prism counted in the protocols for retention/take for all sites in the RUB, not just the LEB?

CDPR-
16

17. Should extend RHB on road affected side of watercourse (not opposite bank) because of greater need for buffer on road side.

CDPR-
17

18. Gravel mining operations should not be linked with this HCP. Rather they should be considered under a separate document.

CDPR-
18

19. Are detention ponds being constructed to levels consistent with expected seismicity and 100 year storm events? Is geologic structure mapped and accounted for in stability of quarry sites?

CDPR-
19

20. The fifteen foot buffer as well as the loosely written prescriptions for protection of amphibian habitat are inadequate. No activity zones of at least 50 feet should be established around springs.

CDPR-
20